IN THE JUSTICE COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF COCHISE, PRECINCT No. 1

| Defendant(s). | |
|------------------------------------|---------------------------|
| BRIAN CAMPBELL and MONICA CAMPBELL | COMPLAINT |
| Plaintiff, vs. | CASE NO. CR2019- 0084 (M) |
| STATE OF ARIZONA, | CASE NO. CR2019-0093 (B) |

The complainant herein, Michael A. Powell, Deputy County Attorney, pursuant to Rule 2.3, Rules of Criminal Procedure, on information and belief complains against:

BRIAN CAMPBELL and MONICA CAMPBELL

and charge that in Justice Court Precinct No. 1

Count 1: Aggravated Assault by Domestic Violence

On or about July 21, 2018, BRIAN CAMPBELL and MONICA CAMPBELL knowingly touched A.C. with intent to injure, insult or provoke A.C., and A.C. was bound or otherwise physically restrained or A.C.'s capacity to resist was substantially impaired, and A.C. is related to BRIAN CAMPBELL and MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-1204(A)(4), 13-1203(A)(3), 13-3601 et seq., 13-105, 13-303, 13-701, 13-702, 13-703, and 13-801, a class 6 felony.

This offense occurred when MONICA CAMPBELL provided a taser to BRIAN CAMPBELL who utilized the tazer on A.C. while A.C. was restrained or his capacity to resist was substantially impaired.

Count 2: Child Abuse by Domestic Violence

On or about July 21, 2018, under circumstances other than those likely to produce death or serious physical injury to a child, BRIAN CAMPBELL and MONICA CAMPBELL, having care or custody of A.C., a child under the age of eighteen, intentionally or knowingly caused or permitted the person or health of A.C. to be injured, and A.C. is related to BRIAN CAMPBELL and MONICA CAMPBELL as a child by

blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-303, 13-701, 13-702, 13-703, and 13-801, a class 4 felony. This offense occurred when MONICA CAMPBELL provided a taser to BRIAN CAMPBELL who utilized the tazer on A.C. while A.C. was restrained or his capacity to resist was substantially impaired.

Count 3: Permitting Life, Health, or Morals of a Minor to Be Imperiled
On or between 2016 and 2018, BRIAN CAMPBELL and MONICA
CAMPBELL, having custody of A.C., a minor under sixteen years of age, knowingly caused or permitted the moral welfare of A.C. to be imperiled by neglect, abuse, or immoral associations, all in violation of A.R.S. §§ 13-3619, 13-105, 13-303, 13-707, and 13-802, a class 1 misdemeanor.

This offense occurred when BRIAN CAMPBELL and MONICA CAMPBELL had A.C. stand naked with his adoptive siblings inside a home with video cameras as a form of punishment.

Count 4: Permitting Life, Health, or Morals of a Minor to Be Imperiled
On or between 2016 and 2018, BRIAN CAMPBELL and MONICA
CAMPBELL, having custody of M.C., a minor under sixteen years of age, knowingly caused or permitted the moral welfare of M.C. to be imperiled by neglect, abuse, or immoral associations, all in violation of A.R.S. §§ 13-3619, 13-105, 13-303, 13-707, and 13-802, a class 1 misdemeanor.

This offense occurred when BRIAN CAMPBELL and MONICA CAMPBELL had M.C. stand naked with her adoptive siblings inside a home with video cameras as a form of punishment.

Count 5: Permitting Life, Health, or Morals of a Minor to Be Imperiled On or between 2016 and 2018, BRIAN CAMPBELL and MONICA CAMPBELL, having custody of K.C., a minor under sixteen years of age, knowingly caused or permitted the moral welfare of K.C. to be imperiled by neglect, abuse, or immoral associations, all in violation of A.R.S. §§ 13-3619, 13-105, 13-303, 13-707, and 13-802, a class 1 misdemeanor.

This offense occurred when BRIAN CAMPBELL and MONICA CAMPBELL had K.C. stand naked with his adoptive siblings inside a home with video cameras as a form of punishment.

Count 6: Permitting Life, Health, or Morals of a Minor to Be Imperiled
On or between 2016 and 2018, BRIAN CAMPBELL and MONICA
CAMPBELL, having custody of B.C., a minor under sixteen years of age, knowingly caused or permitted the moral welfare of B.C. to be imperiled by neglect, abuse, or immoral associations, all in violation of A.R.S. §§ 13-3619, 13-105, 13-303, 13-707, and 13-802, a class 1 misdemeanor.

This offense occurred when BRIAN CAMPBELL and MONICA CAMPBELL had B.C. stand naked with his adoptive siblings inside a home with video cameras as a form of punishment.

Count 7: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of A.C., a child under the age of eighteen, intentionally or knowingly caused or permitted the person or health of A.C. to be injured, and A.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D), and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL would strike A.C. with a wooden object.

Count 8: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of M.C., a child under the age of eighteen, intentionally or knowingly caused or permitted the person or health of M.C. to be injured, and A.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL would strike M.C. with a wooden object.

Count 9: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, BRIAN CAMPBELL and MONICA CAMPBELL, having care or custody of K.C., a child under the age of eighteen, intentionally or knowingly caused or permitted the person or health of K.C. to be injured, and K.C. is related to BRIAN CAMPBELL and MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D) and 13-801, a class 4 felony. This offense occurred when BRIAN CAMPBELL and MONICA CAMPBELL would strike K.C. with a wooden object.

Count 10: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of B.C., a child under the age of eighteen, intentionally or knowingly caused or permitted the person or health of B.C. to be injured, and A.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D) and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL would strike B.C. with a wooden object.

Count 11: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of A.C., a child under the age of eighteen, intentionally or knowingly caused or permitted A.C. to be placed in a situation where the person or health of A.C. was endangered, and A.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D), and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL withheld food from A.C. for a period of two to three days.

Count 12: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of M.C., a child under the age of eighteen, intentionally or knowingly caused or permitted M.C. to be placed in a situation where the person or health of M.C. was endangered, and M.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D) and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL withheld food from M.C. for a period of two to three days.

Count 13: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of K.C., a child under the age of eighteen, intentionally or knowingly caused or permitted K.C. to be placed in a situation where the person or health of K.C. was endangered, and K.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D), and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL withheld food from K.C. for a period of two to three days.

Count 14: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of B.C., a child under the age of eighteen, intentionally or knowingly caused or permitted B.C. to be placed in a situation where the person or health of B.C. was endangered, and B.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D), and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL withheld food from B.C. for a

period of two to three days.

Count 15: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of A.C., a child under the age of eighteen, intentionally or knowingly caused

or permitted A.C. to be placed in a situation where the person or health of A.C. was endangered, and A.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D), and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL would choke A.C.

Count 16: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of B.C., a child under the age of eighteen, intentionally or knowingly caused or permitted B.C. to be placed in a situation where the person or health of B.C. was endangered, and B.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D), and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL would choke B.C.

Count 17: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of A.C., a child under the age of eighteen, intentionally or knowingly caused or permitted A.C. to be placed in a situation where the person or health of A.C. was endangered, and A.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D), and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL would sit on A.C.

Count 18: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of K.C., a child under the age of eighteen, intentionally or knowingly caused or permitted K.C. to be placed in a situation where the person or health of K.C. was endangered, and K.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D), and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL would sit on K.C.

Count 19: Child Abuse by Domestic Violence

On or between 2016 and 2018, under circumstances other than those likely to produce death or serious physical injury to a child, MONICA CAMPBELL, having care or custody of B.C., a child under the age of eighteen, intentionally or knowingly caused or permitted B.C. to be placed in a situation where the person or health of B.C. was endangered, and B.C. is related to MONICA CAMPBELL as a child by blood or court order, all in violation of A.R.S. §§ 13-3623(B)(1), 13-3601 et seq., 13-105, 13-701, 13-702, 13-703, 13-705(D), and 13-801, a class 4 felony.

This offense occurred when MONICA CAMPBELL would sit on B.C.

Count 20: Permitting Life, Health, or Morals of a Minor to Be Imperiled

On or between 2016 and 2018, BRIAN CAMPBELL and MONICA CAMPBELL, having custody of M.C., a minor under sixteen years of age, knowingly caused or permitted the moral welfare of M.C. to be imperiled by neglect, abuse, or immoral associations, all in violation of A.R.S. §§ 13-3619, 13-105, 13-303, 13-707, and 13-802, a class 1 misdemeanor.

This offense occurred when BRIAN CAMPBELL and MONICA CAMPBELL had M.C. sleep naked in their bed with her adoptive brothers.

DATED this 25 day of February, 2019.

COCHISE COUNTY ATTORNEY

BY:

Michael A. Powell

Deputy County Attorney

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